

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH DIVISION

CASE NO. 21-82235-CIV-CANNON

THE CORING COMPANY, on behalf of itself
and all others similarly situated

Plaintiffs,

v.

APPLE INC.

Defendant.

**DECLARATION OF RACHEL S. BRASS IN SUPPORT OF
APPLE INC.'S REPLY IN SUPPORT OF ITS
MOTION TO TRANSFER VENUE**

1. I am an attorney licensed to practice in the State of California, and I have been admitted *pro hac vice* in this case. I am a partner at the law firm Gibson, Dunn & Crutcher LLP, counsel of record for Defendant Apple Inc. (“Apple”) in this case. I am also counsel of record for Apple in the related cases *Coronavirus Reporter v. Apple Inc.*, No. 21-cv-5567-EMC (N.D. Cal.) and *Primary Productions LLC v. Apple Inc.*, No. 21-cv-6841-EMC (N.D. Cal.), as well as the earlier, pre-transfer iteration of the latter case *Primary Productions LLC v. Apple Inc.*, No. 21-cv-137-JDL (D. Me.). I submit this declaration in support of Apple’s Reply In Support Of Its Motion to Transfer Venue (“Reply”). I have personal knowledge of the facts stated below and, if called as a witness, I could and would testify competently thereto.

2. A true and correct copy of Plaintiffs’ Reply For Reconsideration and Relief From Judgment, as filed in *Coronavirus Reporter v. Apple Inc.*, No. 21-cv-5567-EMC, Dkt. 95 (N.D. Cal. Jan. 18, 2022), is attached hereto as **Exhibit A**.

3. A true and correct copy of an Exhibit attached to Jeffrey Isaacs' Notice of Motion and Motion for Sanctions, as filed in *Coronavirus Reporter v. Apple Inc.*, No. 21-cv-5567-EMC, Dkt. 97-1 (N.D. Cal. Jan. 24, 2022), is attached hereto as **Exhibit B**. Plaintiff Coring Company has filed the underlying Motion for Sanctions, which was summarily denied by the Northern District of California, *see* Dkt. 28-1, on the docket in this case at Dkt. 26-1.

4. A true and correct copy of Jeffrey Isaacs' Notice of Motion For Rule 11 & Rule 37 Sanctions, as filed in *Coronavirus Reporter v. Apple Inc.*, No. 21-cv-5567-EMC, Dkt. 96 (N.D. Cal. Jan. 19, 2022), is attached hereto as **Exhibit C**.

5. A true and correct copy of the webpage for "The Coring Company" on the Florida Secretary of State, Division of Corporations' official database as of today, February 15, 2022, is attached hereto as **Exhibit D**.

6. A true and correct copy of the Articles of Incorporation for "The Coring Company," located on the Florida Secretary of State, Division of Corporations' official database, is attached hereto as **Exhibit E**.

7. A true and correct copy of a screenshot of the home page for the UPS Store at 4613 N. University Drive, Coral Springs, FL, 33067 as of February 14, 2022 is attached hereto as **Exhibit F**.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and that this Declaration was executed on February 15, 2022 at San Francisco, California.

/s/ Rachel S. Brass
Rachel S. Brass